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January 24, 2019

**VIA CM/ECF FILING**

The Honorable James K. Bredar  
Chief U.S. District Judge  
United States District Court of Maryland  
Northern Division  
101 West Lombard Street, Chambers 3D  
Baltimore, Maryland 21201

**Re: Scheduling Conference**

*Linda J. Adams v. Nationwide Mutual Fire Ins. Co.*  
U.S. District Court for the District of Maryland  
Case No.: JKB-19-0053

Dear Chief Judge Bredar:

Please accept this as correspondence in anticipation of the Scheduling Conference Call scheduled in the above-referenced matter set to be held this Friday, January 25, 2019, at 9:45 AM. Pursuant to the Court's order pertaining to the conference call, Doc. No. 7, counsel have conferred and determined it would be appropriate to postpone this initial scheduling conference for the following reasons.

This case is an insurance coverage declaratory judgment action arising out of a dog bite incident where Plaintiff Linda J. Adams sustained personal injuries. Ms. Adams filed a tort action in Maryland state court against Margaret Burgone and Welby Joe Croson for damages and obtained a judgment. Thereafter, Ms. Adams filed this action in the Circuit Court of Maryland for Anne Arundel County against Nationwide Mutual Fire Insurance Company ("Nationwide") seeking a judicial declaration that Nationwide has a duty to defend and indemnify Margaret Burgone and Welby Joe Croson for the dog bite tort action. Nationwide removed this action to this Court promptly after being served.

Prior to service of this action, Nationwide filed its own declaratory judgment action arising out of Ms. Adams's dog bite tort case. That case, entitled *Nationwide Mutual Fire Insurance Company v. Evergreen Road, LLC, et al.*, is also assigned to Your Honor's docket as Case No. JKB-18-03995 and is flagged as a related case to the above-referenced matter. In that case, Nationwide named four defendants: Ms. Adams, Margaret Burgone, Welby Joe Croson, and its named insured Evergreen Road, LLC. To date, service upon Mr. Croson is still outstanding, and Ms. Burgone and Evergreen Road have yet to file answers to the Complaint.

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Accordingly, counsel have conferred and agree that the two related cases should be consolidated and that the scheduling conference be postponed to afford time for Mr. Croson to be served and for all defendants Nationwide's declaratory judgment action to file responsive pleadings. Counsel proposes that the scheduling conference be scheduled during the first week of March 2019.

Respectfully submitted,



Steven E. Leder  
Counsel for Nationwide

CC: Erik T. Kirk, Counsel for Plaintiff (via CM/ECF)